

KOBRE & KIM LLP

Jonathan D. Cogan (admitted *pro hac vice*)
Steven W. Perlstein (admitted *pro hac vice*)
Igor Margulyan (admitted *pro hac vice*)
Daisy Y. Joo (admitted *pro hac vice*)
Mathew T. Elder (admitted *pro hac vice*)
800 Third Avenue
New York, NY 10022
Tel: (212) 488-1200
jonathan.cogan@kobrekim.com
steven.perlstein@kobrekim.com
igor.margulyan@kobrekim.com
daisy.joo@kobrekim.com
mathew.elder@kobrekim.com

Daniel A. Zaheer (Bar ID 237118)
150 California Street, 19th Floor
San Francisco, CA 94111
Tel: (415) 582-4800

*Attorney for Defendants
Jump Trading, LLC and
Jump Crypto Holdings LLC*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

AUSTIN WARD, DAVID KREVAT, and NABIL
MOHAMAD, individually and on behalf of all
others similarly situated

Plaintiffs,

vs.

JUMP TRADING, LLC; JUMP CRYPTO
HOLDINGS LLC; and DOES 1-10

Defendants.

Case No. 3:25-cv-03989-PHK

**JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
TIME TO RESPOND TO MOTION
FOR RULE 11 SANCTIONS**

Hon. Peter H. Kang

1 Pursuant to Local Rule 6-2, Defendants Jump Trading, LLC and Jump Crypto Holdings LLC
2 (collectively, “Jump Defendants”) and Plaintiffs Austin Ward, David Krevat, and Nabil Mohamad
3 (collectively, “Plaintiffs”) by and through their counsel in the above-captioned action, hereby
4 stipulate:

5 WHEREAS, Jump Defendants served counsel for Plaintiffs with the Notice of Motion and
6 Motion for Sanctions Pursuant to Rule 11 of the Federal Rules of Civil Procedure and accompanying
7 Appendix A (the “Motion for Sanctions”) on August 1, 2025;

8 WHEREAS, the 21-day safe harbor provision mandated by Federal Rule of Civil Procedure
9 11(c)(2) expired on August 22, 2025;

10 WHEREAS, the Court so-ordered the Parties’ stipulation continuing the Initial Case
11 Management Conference and all other deadlines set forth in the Initial Case Management Order and
12 extending the Parties’ time to respond to the Complaint on May 30, 2025 (Dkt. No. 14);

13 WHEREAS, there have been no other previous time modifications in this case, whether by
14 stipulation or Court order;

15 WHEREAS, the parties have conferred and agreed, subject to approval of the Court, to a
16 briefing schedule for the Motion for Sanctions;

17 WHEREAS, this stipulation will neither prejudice the interests of the Parties or the Court;

18 NOW THEREFORE, counsel for Plaintiffs and Jump Defendants stipulate and agree that:

- 19 1. Jump Defendants shall file their Motion for Sanctions on or before September 26, 2025;
- 20 2. Plaintiffs’ opposition, if any, shall be filed on or before October 24, 2025;
- 21 3. Jump Defendants’ reply brief in further support of their Motion for Sanctions, if any,
22 shall be filed on or before November 14, 2025;

23 IT IS SO STIPULATED.

24
25 Dated: September 25, 2025
26
27
28

1 Respectfully submitted,

2
3 KOBRE & KIM LLP

ERICKSON KRAMER OSBORNE LLP

4 /s/ Jonathan D. Cogan

/s/ Julie C. Erickson

5 Jonathan D. Cogan

Julie C. Erickson

6 Jonathan D. Cogan (admitted *pro hac vice*)

Julie C. Erickson (Bar ID 293111)

7 Steven W. Perlstein (admitted *pro hac vice*)

Elizabeth Kramer (Bar ID 293129)

8 Igor Margulyan (admitted *pro hac vice*)

Kevin Osborne (Bar ID 261367)

9 Daisy Y. Joo (admitted *pro hac vice*)

959 Natoma Street

10 Mathew T. Elder (admitted *pro hac vice*)

San Francisco, CA 94103

11 800 Third Avenue

Tel.: (415) 635-0631

12 New York, NY 10022

julie@eko.law

13 Tel.: (212) 488-1200

elizabeth@eko.law

14 jonathan.cogan@kobrekim.com

kevin@eko.law

15 steven.perlstein@kobrekim.com

16 igor.margulyan@kobrekim.com

17 daisy.joo@kobrekim.com

Attorneys for Plaintiffs

18 mathew.elder@kobrekim.com

AUSTIN WARD, DAVID KREVAT, and NABIL

19 Daniel A. Zaheer (Bar ID 237118)

MOHAMAD

20 150 California Street, 19th Floor

21 San Francisco, California 94111

22 Tel.: (415) 582-4751

23 daniel.zaheer@kobrekim.com

24 *Attorneys for Defendants Jump Trading, LLC*

25 *and Jump Crypto Holdings LLC*

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1

Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from each of the above signatories.

By: /s/ Jonathan D. Cogan
Jonathan D. Cogan

[PROPOSED] ORDER

Pursuant to the Stipulation, IT IS SO ORDERED.

Dated: _____, 2025

HON. PETER H. KANG
United States Magistrate Judge